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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

WILLIAM J. KENNEDY, JR. an individual;

Plaintiff,

vs.

LIBERTY INSURANCE CORPORATION,  
a foreign corporation, LM GENERAL  
INSURANCE COMPANY, a foreign  
corporation, THE OHIO CASUALTY  
INSURANCE COMPANY, a foreign  
corporation (a/k/a OHIO SECURITY  
INSURANCE COMPANY); DOES I through  
X, inclusive; and ROE CORPORATIONS, I  
through X, inclusive,

Defendants.

Case No. 2:23-cv-00223-JAD-NJK

ECF No. 10

**STIPULATION AND ORDER EXTENDING THE TIME TO FILE  
PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS,  
DEFENDANTS REPLY TO SAME, AND CONTINUE HEARING  
(First Request)**

Plaintiff, William Kennedy, and Defendants', Liberty Insurance Corporation, LM General Insurance Company, The Ohio Casualty Insurance Company (a/k/a Ohio Security Insurance Company) stipulate as follows:

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1. On February 21, 2023, Defendants' filed their Motion to Dismiss (ECF 5).
2. Plaintiff's Opposition to Defendant's Motion to Dismiss is due March 7, 2023.
3. Plaintiff's counsel has been involved in multiple Meditations on other matters. As such, Plaintiff's counsel requires additional time to have meaningful discussions and file review with Plaintiff to provide the Court a complete outline of facts and issues. This is the first extension of time requested by the Parties related to this Motion (ECF No. 5).
4. Accordingly, they request the following due dates:
  - a. Plaintiff's Opposition: March 10, 2023.
  - b. Defendants' Reply: March 20, 2023.
5. The hearing currently set for March 21, 2023 at 2:00 p.m. be reset to the Courts next available date.

This Stipulation was agreed upon via email exchange on or about March 6, 2023 prior to the response deadline, however due to Plaintiff's counsel and staff commitments out of the office the draft and its final approval were not circulated in time for filing prior to the deadline. The Parties' request is made in good faith and not for purposes of delay.

Dated this 9<sup>th</sup> day of March, 2023

Dated this 9<sup>th</sup> day of March, 2023

/s/ Jerome R. Bowen, Esq.

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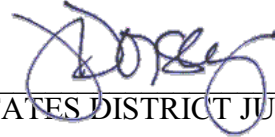
/s/ Jonathan Carlson, Esq.

Jonathan W. Carlson, Esq.  
 Nevada Bar No. 10536  
 Henry H. Kim, Esq.  
 Nevada Bar No. 14390  
 MCCORMICK, BARSTOW, SHEPPARD,  
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 8337 W. Sunset Road, Suite 350  
 Las Vegas, Nevada 89113  
*Attorneys for Defendants*

Case No. 2:23-cv-00223-JAD-NJK

**ORDER**

IT IS SO ORDERED. The response to the motion to dismiss [11] is deemed timely, and the 3/21/23 hearing is **RESET to the hearing stack on 4/18/23 at 2 p.m.**



3-13-23

UNITED STATES DISTRICT JUDGE

Submitted by:

s/ Jerome R. Bowen, Esq.

Jerome R. Bowen, Esq.

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